

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

In Re: WILLIAM O JONES, JR) Case No. 19-41960
SANDRA E JONES)
Debtors)

RESPONSE TO MOTION FOR RELIEF FROM STAY

COME NOW Debtors, William and Sandra Jones, by and through Counsel, and for this Response to the Motion for Relief from the Automatic Stay (Doc. #144) filed by creditor, Freedom Mortgage Corporation, its subsidiaries, affiliates, predecessors in interests, successors or assigns (collectively the “Creditor”), show the Court as follows:

1. Debtors remitted a payment of \$1,400.00 to Freedom Mortgage on or about March 16, 2023 and a payment in the amount of \$1,238.50 on or about March 17, 2023 which brings the mortgage contractually current through March 2023.
2. Debtors further state they will make the April 2023 and subsequent payments on time.
3. For the foregoing reasons, Debtors move the Court to deny Creditor’s Motion for Relief.

WHEREFORE, Debtor prays the Court for an order denying the Motion for Relief from the Automatic Stay filed by creditor, Freedom Mortgage Corporation, and for such other relief as the Court deems equitable and proper.

Dated: March 21, 2023

Respectfully submitted,
WM Law

/s/ Errin P. Stowell

Errin P Stowell KS 78742

15095 W. 116th St.

Olathe, KS 66062

Phone (913) 422-0909 / Fax (913) 428-8549

stowell@wagonergroup.com

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2023, the foregoing was delivered via e-mail to the parties listed below that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to the parties listed below that are not registered to receive electronic filings on ECF.

Michael J. McCormick
McCalla Raymer Leibert Pierce, LLC
1544 Old Alabama Road
Roswell, GA 30076

/s/ Errin P Stowell